

Message

**From:** Veronica Felzke [vfelzke@ramboll.com]  
**Sent:** 3/12/2021 8:26:51 PM  
**To:** Razzazian, Christopher [Razzazian.Christopher@epa.gov]; R8AirPermitting [R8AirPermitting@epa.gov]; steve.babits@northernarapaho.com  
**CC:** Koch, Michelle [Michelle.Koch@meritenergy.com]; Eric Hodek [EHodek@ramboll.com]  
**Subject:** RE: Merit Energy Company - Steamboat Butte E5 - Initial Part 71 Title V Operating Permit Application

Chris,

Updated numbers below.

Let us know what else you need.

Sincerely,

**M Veronica Felzke**  
Managing Consultant - Air Quality

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vfelzke@ramboll.com

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**From:** Razzazian, Christopher <Razzazian.Christopher@epa.gov>  
**Sent:** Thursday, March 11, 2021 10:12 AM  
**To:** Veronica Felzke <vfelzke@ramboll.com>; R8AirPermitting <R8AirPermitting@epa.gov>; steve.babits@northernarapaho.com  
**Cc:** Koch, Michelle <Michelle.Koch@meritenergy.com>; Eric Hodek <EHodek@ramboll.com>  
**Subject:** RE: Merit Energy Company - Steamboat Butte E5 - Initial Part 71 Title V Operating Permit Application

Thank you Veronica,

Based on the last synthetic MNSR permit application I've updated the GHG calculations. However, the current TV application doesn't seem to have the summary of GHG emissions.

Could you please fill in the emission rates for the cells listed as question marks. The sum of these cells needs to be 472.27 tpy CO<sub>2</sub>e (emissions from the tank flare seperated by origin of the flared gas).

Emission Unit Id.	Regulated Air Pollutants (tons/year)								
	NO <sub>x</sub> *	VOC*	SO <sub>2</sub> *	PM <sub>10</sub> *	PM <sub>2.5</sub> *	CO*	CO <sub>2</sub> e*	HAP*	H <sub>2</sub> S*
FL-1 <sup>1</sup>	0.03	0.06	0	<0.01	<0.01	0.17	76.15	--	--
FL-2 <sup>2</sup>	0.03	0.06	0	<0.01	<0.01	0.17	76.15	--	--
E5HT-1 <sup>1</sup>	1.77	23.52	186.39	0.20	0.20	9.63	3853.31	1.39	4.96
E5B-1	1.2	0.07	0.01	0.09	0.09	1.01	0.06	0.02	<0.01
E5 Run Tank <sup>2</sup>	0.23	3.51	38.87	0.03	0.03	1.24	467.29	0.14	1.04
E5 Reject Tank <sup>2</sup>	<0.01	0.02	0.24	<0.01	<0.01	0.01	2.49	<0.01	0.01
E5 Overflow Tank <sup>2</sup>	<0.01	0.02	0.24	<0.01	<0.01	0.01	2.49	<0.01	0.01
E5 WTK-01	--	7.98	--	--	--	--	381.35	0.25	7.1

E5 WTK-02	--	7.98	--	--	--	--	381.35	0.25	7.1
E5 Drip Vessel	--	--	--	--	--	--	--	--	--
E5 PR Tank	--	<0.01	--	--	--	--	0.01	<0.01	<0.01
MSS-DEGAS	--	<0.01	--	--	--	--	<0.01	<0.01	<0.01
E5 LOAD	--	0.16	--	--	--	--	<0.01	<0.01	<0.01
FUG-1 (not included in facility PTE total)	--	10.22	--	--	--	--	204.92	0.04	2.05
<b>TOTAL</b>	3.26	43.38	225.76	0.32	0.32	12.24	5,243.67	2.05	20.20

Thank you so much for your attention to this matter.

Christopher Razzazian  
Mechanical/Environmental Engineer  
US EPA Region 8  
(303)312-6648

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**From:** Veronica Felzke <[vfelzke@ramboll.com](mailto:vfelzke@ramboll.com)>  
**Sent:** Wednesday, March 10, 2021 4:21 PM  
**To:** Razzazian, Christopher <[Razzazian.Christopher@epa.gov](mailto:Razzazian.Christopher@epa.gov)>; R8AirPermitting <[R8AirPermitting@epa.gov](mailto:R8AirPermitting@epa.gov)>; [steve.babits@northernarapaho.com](mailto:steve.babits@northernarapaho.com)  
**Cc:** Koch, Michelle <[Michelle.Koch@meritenergy.com](mailto:Michelle.Koch@meritenergy.com)>; Eric Hodek <[EHodek@ramboll.com](mailto:EHodek@ramboll.com)>  
**Subject:** RE: Merit Energy Company - Steamboat Butte E5 - Initial Part 71 Title V Operating Permit Application

All,

On behalf of Merit Energy Company, Ramboll is resubmitting the enclosed Part 71 Title V Initial Operating Permit application for the Steamboat Butte E5 Tank Battery, located on the Wind River Indian Reservation in Wyoming.

Enclosed is application document, containing forms: GIS, EUD1, EUD2, EUD3, EMISS, PTE, FEE, FF, I-COMP, CTAC.

If you have any questions or comments, contact Michelle Koch and/or me.

Sincerely,

**M Veronica Felzke**  
Managing Consultant - Air Quality

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**From:** Razzazian, Christopher <[Razzazian.Christopher@epa.gov](mailto:Razzazian.Christopher@epa.gov)>  
**Sent:** Tuesday, February 16, 2021 4:24 PM  
**To:** Veronica Felzke <[vfelzke@ramboll.com](mailto:vfelzke@ramboll.com)>; R8AirPermitting <[R8AirPermitting@epa.gov](mailto:R8AirPermitting@epa.gov)>; [steve.babits@northernarapaho.com](mailto:steve.babits@northernarapaho.com)  
**Cc:** Koch, Michelle <[Michelle.Koch@meritenergy.com](mailto:Michelle.Koch@meritenergy.com)>; Eric Hodek <[EHodek@ramboll.com](mailto:EHodek@ramboll.com)>  
**Subject:** RE: Merit Energy Company - Steamboat Butte E5 - Initial Part 71 Title V Operating Permit Application

Dear Michelle and Veronica,

Thank you for speaking with me today. After our conversation today it seems that the emissions information and forms will need to be updated. Can you confirm that you would like to withdraw the submitted application and will be resubmitting? Thank you so much for your time and I look forward to working with you.

Christopher Razzazian  
Mechanical/Environmental Engineer  
Air and Radiation Division  
US EPA Region 8  
(303)312-6648

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**From:** Veronica Felzke <[vfelzke@ramboll.com](mailto:vfelzke@ramboll.com)>  
**Sent:** Tuesday, February 16, 2021 10:04 AM  
**To:** Razzazian, Christopher <[Razzazian.Christopher@epa.gov](mailto:Razzazian.Christopher@epa.gov)>; R8AirPermitting <[R8AirPermitting@epa.gov](mailto:R8AirPermitting@epa.gov)>; [steve.babits@northernarapaho.com](mailto:steve.babits@northernarapaho.com)  
**Cc:** Koch, Michelle <[Michelle.Koch@meritenergy.com](mailto:Michelle.Koch@meritenergy.com)>; Eric Hodek <[EHodek@ramboll.com](mailto:EHodek@ramboll.com)>  
**Subject:** RE: Merit Energy Company - Steamboat Butte E5 - Initial Part 71 Title V Operating Permit Application

Yes, sir!

**M Veronica Felzke**  
Managing Consultant - Air Quality

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**From:** Razzazian, Christopher <[Razzazian.Christopher@epa.gov](mailto:Razzazian.Christopher@epa.gov)>  
**Sent:** Tuesday, February 16, 2021 10:03 AM  
**To:** Veronica Felzke <[vfelzke@ramboll.com](mailto:vfelzke@ramboll.com)>; R8AirPermitting <[R8AirPermitting@epa.gov](mailto:R8AirPermitting@epa.gov)>; [steve.babits@northernarapaho.com](mailto:steve.babits@northernarapaho.com)  
**Cc:** Koch, Michelle <[Michelle.Koch@meritenergy.com](mailto:Michelle.Koch@meritenergy.com)>; Eric Hodek <[EHodek@ramboll.com](mailto:EHodek@ramboll.com)>  
**Subject:** RE: Merit Energy Company - Steamboat Butte E5 - Initial Part 71 Title V Operating Permit Application

Thank you. I've started to review. If I have questions may I call you, Veronica?

Thank you,

Christopher Razzazian  
US EPA Region 8  
(303)312-6648

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**From:** Veronica Felzke <[vfelzke@ramboll.com](mailto:vfelzke@ramboll.com)>  
**Sent:** Monday, February 15, 2021 9:54 AM  
**To:** Razzazian, Christopher <[Razzazian.Christopher@epa.gov](mailto:Razzazian.Christopher@epa.gov)>; R8AirPermitting <[R8AirPermitting@epa.gov](mailto:R8AirPermitting@epa.gov)>; [steve.babits@northernarapaho.com](mailto:steve.babits@northernarapaho.com)  
**Cc:** Koch, Michelle <[Michelle.Koch@meritenergy.com](mailto:Michelle.Koch@meritenergy.com)>; Eric Hodek <[EHodek@ramboll.com](mailto:EHodek@ramboll.com)>  
**Subject:** Merit Energy Company - Steamboat Butte E5 - Initial Part 71 Title V Operating Permit Application

All,

On behalf of Merit Energy Company, Ramboll is submitting the enclosed Part 71 Title V Initial Operating Permit application for the Steamboat Butte E5 Tank Battery, located on the Wind River Indian Reservation in Wyoming.

The facility is an existing Oil and Gas Production Facility and will have a controlled potential to emit (PTE) for regulated air pollutants above the major source thresholds as defined in 40 CFR § 49.167 and §52.21. As such, Merit is submitting this application for a Title V operating permit in accordance with 40 CFR §71.3 to emit regulated pollutants and establish federally enforceable limits at the facility pursuant to 40 CFR §71.2. This permit application is intended to replace the Part 71 Title V Initial Operating Permit application submitted on May 27, 2019 and is currently under EPA review.

Merit submitted a NSR synthetic minor source permit application in June 2017, which was amended in May 29, 2020 in accordance with 40 CFR §49.158 to emit regulated air pollutants and establish federally enforceable limits at the facility pursuant to 40 CFR §49.153(a)(3). NSR permit SMNSR-WR-000005-2020.003 was issued on October 2nd, 2020. With the issuance of the requested federally enforceable limits, the facility will not exceed the proposed allowable emissions for criteria air pollutants. Therefore, the facility's emissions will not be at or above the major source Prevention of Significant Deterioration (PSD) thresholds as defined in 40 CFR §52.21(b)(1).

Enclosed is application document, containing forms: GIS, EUD1, EUD2, EUD3, EMISS, PTE, FEE, FF, I-COMP, CTAC.

Sincerely,

**M Veronica Felzke**

Managing Consultant - Air Quality  
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Connect with us



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